

# EXHIBIT A

1 Ruderman

2 March of 2020?

3 A. No.

4 MS. DONNELLY: Now is a good time to  
5 break.

6 (A luncheon recess was taken from  
7 the record.)

8 A F T E R N O O N S E S S I O N :

9 Q. Other than this lawsuit against the  
10 Prakhin Law Firm, have you ever been a party to a  
11 lawsuit before either as a plaintiff or a  
12 defendant?

13 A. I've been a defendant in motor  
14 vehicle accidents.

15 Q. Accidents?

16 A. Yeah.

17 Q. Okay.

18 How many?

19 A. Two.

20 Q. Cases?

21 A. Sorry.

22 Q. Two.

23 And you were a defendant in both of  
24 those?

25 A. Yes.

1 Ruderman

2 Q. And what was the outcome of those  
3 cases?

4 A. One of them was dismissed. They  
5 lost at trial and the other one is still pending.

6 Q. And I am assuming that they were  
7 based on car accidents that you were involved in?

8 A. Yes.

9 Q. Were you the driver of the car?

10 A. Yes.

11 Q. And when did these accidents occur?

12 A. I don't recall.

13 Q. Do you recall the years?

14 A. Not of the one that went to trial.

15 The pending one, maybe 2017, 2016. Something  
16 like that.

17 Q. So it has been pending for a while?

18 A. Yes.

19 Q. And the one that went to trial,  
20 there was a verdict in your favor?

21 A. Yes.

22 Q. Other than the motor vehicle  
23 accidents, any other litigation that you've been  
24 involved in?

25 A. Not that I'm aware of, no.